

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

POLAROID CORPORATION,

Plaintiff and Counterclaim Defendant,

v.

HEWLETT-PACKARD COMPANY,

Defendants and Counterclaim Plaintiff.

C.A. No. 06-738-SLR

REDACTED

**REPLY DECLARATION OF WILLIAM J. MARSDEN, JR.
IN SUPPORT OF DEFENDANT HEWLETT-PACKARD'S MOTION TO
PRECLUDE THE REPORT AND TESTIMONY OF POLAROID'S
SURVEY EXPERT WALTER MCCULLOUGH**

FISH & RICHARDSON P.C.

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Two International Place
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Tel.: (617) 248-5000
Fax: (617) 248-4000
Emails: rfrank@choate.com;
cperez@choate.com

Dated: June 23, 2008

I, William J. Marsden, Jr., declare as follows:

1. I am an attorney with Fish & Richardson P.C., counsel for Defendant Hewlett-Packard Company. I am a member of the Bar of the State of Delaware and of this Court. I have personal knowledge of the matters stated in this declaration and would testify truthfully to them if called upon to do so.

2. Attached hereto as Exhibit H is a true and correct copy of a letter from Adam J. Duerr at Kirkland & Ellis to Robert M. Buchanan on May 22, 2008.

3. Attached hereto as Exhibit I is a true and correct copy of a letter from Robert M. Buchanan to Colby Anne Kingsbury on May 12, 2008.

4. Attached hereto as Exhibit J is a true and correct copy of HP's Third Supplemental Response to Polaroid's First Set of Interrogatories (No. 15) and Supplemental Response to Polaroid's Third Set of Interrogatories (No. 22).

5. Attached hereto as Exhibit K is a true and correct copy of the Expert Report of Paul Fredrickson.

6. Attached hereto as Exhibit L are true and correct copies of materials produced by Kirkland & Ellis to HP, pursuant to the letter at Exhibit H, comprising the survey instrument used to ask questions about a camera and selected materials related to the survey.

7. Attached hereto as Exhibit M are true and correct copies of excerpts from the deposition of Paul Fredrickson.

8. Attached hereto as Exhibit N are true and correct copies of excerpts from the deposition of Walter McCullough.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 23rd of June, 2008 at Wilmington, Delaware.

/s/ William J. Marsden, Jr.
William J. Marsden, Jr.

CERTIFICATE OF SERVICE

I hereby certify that on June 23, 2008, I electronically filed with the Clerk of Court the foregoing document using CM/ECF which will send electronic notification of such filing(s) to the following counsel:

Via Email

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Julia Heaney (#3052)
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Attorneys for Plaintiff and
Counterclaim-Defendant
Polaroid Corporation

Via Email

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mmeghinnes@kirkland.com; mmeghinnes@kirkland.com;
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Attorneys for Plaintiff and
Counterclaim-Defendant
Polaroid Corporation

Courtesy Copy Via Federal Express

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200 East Randolph Drive
Chicago, IL 60601
Phone: 312-861-2000
Fax: 312-861-2200

/s/ William J. Marsden, Jr.

William J. Marsden, Jr.

Exhibit H

KIRKLAND & ELLIS LLP

AND AFFILIATED PARTNERSHIPS

200 East Randolph Drive
Chicago, Illinois 60601

To Call Writer Directly:
312 649-3891
aduerr@kirkland.com

(312) 861-2000
www.kirkland.com

Facsimile:
(312) 861-2200
Dir. Fax: 312 861-2200

May 22, 2008

BY FEDERAL EXPRESS

Robert Buchanan
Choate Hall & Stewart, LLP
Two International Place
Boston, MA 02110

Re: Polaroid v. HP; C.A. No. 06-738

Dear Mr. Buchanan:

Enclosed please find a CD with Polaroid production documents bearing bates numbers POL 7542808 - POL 7544453.

Sincerely,



Adam J. Duerr
Project Assistant

AJD

Enclosure

Exhibit I



CHOATE HALL & STEWART LLP

Robert M. Buchanan, Jr.
t 617-248-5027
f 617-502-5027
rbuchanan@choate.com

May 12, 2008

VIA E-MAIL AND FIRST CLASS MAIL

Colby Anne Kingsbury
Kirkland & Ellis LLP
200 East Randolph Drive
Chicago, IL 60601-6636

Re: *Polaroid Corporation v. Hewlett-Packard Company*
USDC-D.Del.-C.A. No. 06-738 (SLR)
-- Survey Materials of Walter McCullough

Dear Colby:

I am writing to pursue an issue that arose on May 6 at the deposition of Walter McCullough. Mr. McCullough testified that he has possession of survey materials that were prepared in conjunction with this case -- but were not disclosed in his Report and were not provided to Hewlett-Packard Co. ("HP"). HP hereby demands production of these materials pursuant to Fed R. Civ. P. 26.

Mr. McCullough was retained on behalf of Polaroid to conduct a survey concerning printers and cameras. After he received the results of his initial survey, Mr. McCullough was instructed to stop work with respect to cameras and to continue forward on additional survey work with respect to printers. Mr. McCullough's Report addressed the results of both surveys with respect to printers, but did not disclose any of the survey work with respect to cameras. On behalf of Polaroid, you asserted that Mr. McCullough's survey work with respect to cameras is protected as attorney work product.

Polaroid's assertion of the work product doctrine is not correct. Mr. McCullough's initial survey addressed both cameras and printers, and Mr. McCullough necessarily considered the camera results as he went on to prepare the additional printer survey. Likewise, Mr. McCullough necessarily considered the camera results as he wrote his Report and formed his opinions. Fed. R. Civ. P. 26(a)(2)(B)(i-ii) requires that Mr. McCullough disclose in his report all materials furnished to him (for purposes of his work on this case) that he considered in the course of forming his opinions. An expert submitting a report may not withhold such

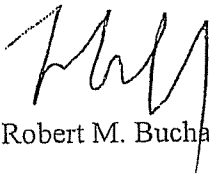
Colby Anne Kingsbury
May 12, 2008
Page 2

materials on the ground that he did not "rely on" them; rather, he must disclose all such materials that he "considered" in the course of forming his opinion. *See* 1993 Advisory Committee Notes to paragraph 2. Accordingly, the survey materials and results with respect to cameras should have been produced and disclosed in Mr. McCullough's Report.

If Polaroid maintains its position after review of this letter, please be advised that HP will seek the Court's assistance to compel production of these materials (followed by an opportunity for Dr. Jacoby to supplement his Expert Rebuttal Report and, to the extent appropriate, a renewed deposition of Mr. McCullough).

I am aware that you have a heavy schedule of depositions. I have some availability this week. So that we may confer on this issue pursuant to the Local Rules, please advise whether you are available for a telephone call at 10:00 a.m. Eastern on May 14, 15 or 16; or at 2:00 p.m. Eastern on May 15 or 16. Alternatively, if you are inclined to respond in writing, please let me know and I will anticipate Polaroid's response no later than May 16.

Very truly yours,



Robert M. Buchanan, Jr.

RMB:tkd

cc: Robert S. Frank, Jr.
Daniel C. Winston
Matthew E. Bernstein

Exhibit J

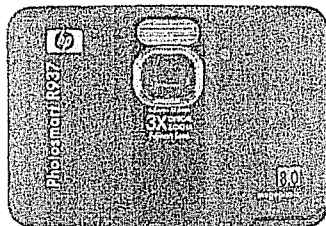
**REDACTED
IN ITS ENTIRETY**

Exhibit K

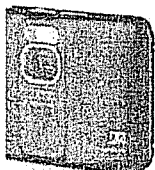
REDACTED
IN ITS ENTIRETY

Exhibit L

HP Photosmart R937 Digital Camera



Price \$249.99



If you like state-of-the-art gadgets, our Photosmart R937 is expressly for you. It sports the coolest interactive touch screen, complete with virtual keyboard. The huge (3.6") display is a joy to use, both indoors and out. Discover how easy it can be to do everything from framing and viewing your photos to sorting and sharing them.

Stand-out design, superior photos

- Capture superior shots with the 8 megapixel resolution; enlarge without compromising image quality
- **Zero in on people and pets** from afar with the 24x total zoom (3x optical, 8x digital)
- **Sharpen subjects in low-light conditions** with the ISO 1600 setting; enhance detail with the adaptive lighting technology and HP Steady Photo mode
- **Frame, view, edit, and organize photos**—indoors or out—on the bright, 3.6", interactive touch screen with virtual keyboard
- **Grab and go**—this remarkably thin model slips into a pocket or purse



Bye-bye, red eye (and pet eye glow)

- Remove red-eye and unsightly pet eye glow, right in the camera
- Enhance images with colors and borders before they leave the camera
- Sort photos as you snap them with fast on-screen "tagging"; you can also mark them for e-mailing later
- Simplify editing, printing, and sharing with the included Photosmart software

Award-winning support

- Get peace of mind with the one-year limited warranty plus Total Care advice and support
- Get product questions answered toll-free, 24 x 7, or via e-mail in as little time as an hour—at www.HP.com/go/totalcare

MONROE MENDELSON RESEARCH, INC.
841 BROADWAY
NEW YORK, NY 10003
(800) 223-7620
(212) 677-8833 (FAX #)

TO: SUPERVISORS
FROM: TOM JASORKA
RE: CAMERA SURVEY - MMR #4450C (YELLOW)
DATE: JANUARY, 2008

Enclosed please find the following materials:

80 Screeners (YELLOW)
70 Main Questionnaires (YELLOW)
6 Screeners "For Briefing Only" (YELLOW)
6 Main Questionnaires "For Briefing Only" (YELLOW)
8 Briefing Participation/Non Disclosure Forms (BLUE)
2 Supervisor Instructions (WHITE)
6 Interviewer Instructions (LAVENDER)
6 Male Interim Report Forms (WHITE)
6 Female Interim Report Forms (WHITE)
40 Tally Sheets (WHITE)
4 Age Cards (WHITE)
4 Cards Q.3 (WHITE)
2 Mall Quota Sheets - Screenings (WHITE)
20 Validation Forms (YOU MAY NOT USE ANY OTHER VALIDATION FORMS OTHER THAN THE ONES WE SENT YOU, UNLESS SPECIFICALLY AUTHORIZED BY MMR.)
4 Camera Descriptions (YELLOW DOT)

Check that you have received the above materials in sufficient quantities. Contact Monroe Mendelsohn Research (MMR) immediately if any materials are missing.

MAIN QUESTIONNAIRES HAVE BEEN INTERCOLLATED. DO NOT DISTURB THE ORDER.

QUOTA

Your quota is 26 interviews, with males and females, 18 years of age or older, who have bought a digital camera in the past 12 months AND/OR think they might buy a digital camera in the next 12 months. Additionally, they may not work in the mall, must have contact lenses or eyeglasses with them if they wear them, and meet the occupation and past participation screening.

ALTHOUGH THE INTERVIEW QUOTA IS NOT BROKEN DOWN BY SEX AND AGE, THERE ARE SCREENING QUOTAS BY SEX AND AGE. **A COMPLETED SCREENING IS DEFINED AS SOMEONE WHO ANSWERS AT LEAST Q.G1/G2 ON THE SCREENER.** COMPLETED INTERVIEWS, TERMINATES AT Q.G1/G2, Q. H AND TERMINATES MID-INTERVIEW COUNT AS COMPLETED SCREENINGS. TERMINATES AT Q's A, C, D, E OR F DO NOT COUNT AS COMPLETED SCREENINGS.

MMR #4450C
January, 2008

Page 2

SUPERVISOR INSTRUCTIONS

YOUR **SCREENING QUOTAS** BY GENDER AND AGE ARE AS FOLLOWS:

AGE	SCREENING QUOTA		SCREENING QUOTA		SCREENING QUOTA	
	TOTAL QUOTA		MALE QUOTA		FEMALE QUOTA	
	NUMBER	PERCENT	NUMBER	PERCENT	NUMBER	PERCENT
18 to 34 years of age	33	31%	17	16%	16	15%
35 to 49 years of age	32	30%	16	15%	16	15%
50 years of age or older	41	39%	19	18%	22	21%
TOTAL	106	100%	52	49%	54	51%

NOTE: If you have not completed your quota of 26 interviews after completing your screening quota of 106 screenings, call immediately for an adjusted screening quota.

IF YOU CANNOT OBTAIN AN ADJUSTED SCREENING QUOTA, CONTINUE SCREENING BY SEX AND AGE IN THE PROPORTION SHOWN ABOVE UNTIL YOU COMPLETE 26 INTERVIEWS.

CREW SIZE

You will need 3-4 interviewers per shift to complete this project on schedule.

No interviewer may complete more than 7 SCREENERS (QUALIFIED AND COOPERATIVE).

No interviewer may complete more than 7 MAIN QUESTIONNAIRES.

If circumstances arise in which an interviewer may need to complete more than 7 Screeners or 7 Main Questionnaires in order to finish the study on schedule, you must contact our office first. We will inform you whether or not we can permit this.

TALLY SHEETS

You have been provided with White Tally Sheets on which to record all terminates.

MALL QUOTA CONTROL SHEETS

You have been provided with White Mall Quota Control Sheets. Post the Mall Quota Control Sheet near the area where the interviewing will take place so that interviewers can record each screening and completed main interview by sex and age group.

METHOD OF INTERVIEWING

All respondents are to be screened in the main mall. All qualified respondents are to be taken to a separate area, off the main mall, where a Camera Description will be shown and the interview will be conducted. Respondents must not be in either hearing or viewing distance of each other during the interview phase. All interviewers must record answers as clearly and as darkly as possible.

POL 7542810

MMR #4450C
January, 2008

Page 3

SUPERVISOR INSTRUCTIONS

RECORDING OF INTERVIEWER NAME

You must record the name of the Screener Interviewer where indicated on the Screener and the Main Questionnaire Interviewer where indicated on the Main Questionnaire. If the Screener and Main Questionnaire Interviewer are the same person, you must still record the name in both locations.

FIELD DATES

Interviewing is to begin on Thursday, January 24th and must be completed no later than Sunday, January 27, 2008.

INTERVIEWING HOURS

WEEKDAYS: = 5:00PM - 9:30PM
WEEKENDS: = 10:00AM - 9:30PM

NOTE: WEEKDAY INTERVIEWING MUST NOT START BEFORE 5:00PM! ANY INTERVIEWS NOT COMPLETED WITHIN THE TIME PERIOD INDICATED WILL NOT BE ACCEPTED.

BRIEFING

You must conduct a personal briefing with all interviewers working on this study. Each interviewer must complete a practice interview, including use of the Camera Description, so that any errors can be caught before field work begins. You have been provided with Screeners and Main Questionnaires labeled "For Briefing Only" to be used for briefing purposes. Go over these "For Briefing Only" interviews while the interviewers are still at the briefing so that mistakes can be corrected before actual interviewing begins. "For Briefing Only" Screeners and Main Questionnaires must be returned to MMR with your first shipment of completed work.

BRIEFING PARTICIPATION/NON-DISCLOSURE STATEMENT

Each interviewer working on this study is required to sign the Briefing Participation/Non-Disclosure Statement which must be returned to MMR with your first shipment.

INTERIM REPORT

Fax or call MMR on Friday, January 25th by 10AM (NY Time) with a cumulative and complete report of all the Information required on the Interim Report Form. Fax reports to (212) 677-8833.

EDITING

All work must be edited by you. Use only a green pencil for this purpose. Never change an answer, simply indicate where an error has been made. If a questionnaire is incorrect or illegible, it must be replaced.

MMR #4450C
January, 2008

Page 4

SUPERVISOR INSTRUCTIONS

VALIDATION FORMS

The Validation Forms were customized for this study. You may not substitute any other Validation Forms for the ones we sent you.

You must complete Validation Forms representing all completed interviews. Each form should represent one Screener Interviewer's work. Note: There is also a column for recording Main Questionnaire Interviewer. You must record the Main Questionnaire Interviewer for every respondent listed on the Validation Form, even if the Main Questionnaire Interviewer is the same as the Screener Interviewer.

If a respondent refuses to give a telephone number, you must try to obtain it from your local directory.

YOU ARE NOT TO VALIDATE ANY PORTION OF THIS STUDY. However, Validation Forms must be completed and returned to MMR. We will validate up to 100% of the Questionnaires.

VALIDATION OF WORKING PHONE NUMBER

While the Main Questionnaire is being administered to a respondent, the supervisor should dial the phone number provided by the respondent to verify that it is a working number. If it isn't, the supervisor should re-check the number with the respondent.

RETURN OF WORK

Monday, January 28th All Completed Interviews to date with corresponding Validation Forms, "For Briefing Only" Questionnaires, and Briefing Participation/Non Disclosure Forms are to be shipped DHL Next Day 10:30 unless otherwise instructed. **OUR DHL ACCOUNT NUMBER IS 803714331.**

ALL MATERIALS MUST BE SEPARATED BY SCREENER INTERVIEWER WITHIN THE SHIPMENT WITH APPROPRIATE VALIDATION FORMS ON TOP OF EACH SCREENER INTERVIEWER'S WORK. WE WILL ADVISE YOU OF ADDITIONAL SHIPMENTS. DO NOT RETURN ANY OTHER MATERIALS TO MMR UNTIL INSTRUCTED TO DO SO.

BILLING

Submit a bill, addressed to Thomas Jasorka, on your own letterhead, within one week of completion of this study.

HONOROE MENDELSON RESEARCH, INC.

841 BROADWAY
NEW YORK, NEW YORK 10003
(800) 223-7620
(212) 677-8833 (FAX #)

MMR #4450C
January, 2008

Camera Survey

INTERVIEWER INSTRUCTIONS **YELLOW QUESTIONNAIRE**

I. METHOD OF INTERVIEWING

All respondents are to be screened in the main mall. All qualified respondents are to be taken to a separate area off the main mall where a Camera Description will be shown and the interview will be conducted. Respondents must not be in hearing or viewing distance of each other.

ALL INTERVIEWS MUST BE SIGNED BY THE RESPONDENT.

II. ELIGIBLE RESPONDENT

The eligible respondent is a male or female who:

**BE SURE TO
RECORD
THESE
ACCURATELY.**

**WE VALIDATE
EACH
RESPONDENT
ON EVERY
ONE OF
THESE
QUALIFI-
CATIONS**

- QA. Does not work in the mall.
- QB/C. Has eye wear with him/her, if required.
- QD. Is 18 years of age or older and qualifies for an Open Screening Quota.
- QE. Neither respondent, nor anyone in respondent's household works for an advertising agency, marketing research firm or in the production, distribution or sale of computers, cameras or printers.
- QF. Has not been interviewed in any mall in the past three months.
- QG1/2. Has bought a digital camera in the past 12 months AND/OR thinks he/she might buy a digital camera in the next 12 months.
- QH. Is willing to participate.

A Screening Questionnaire has been provided to determine eligibility.

III. FIELD DATES

Interviewing is to begin on Thursday, January 24th and be completed by Sunday, January 27th, 2008. Your supervisor will assign the specific hours you are to work.

INTERVIEWERS, PLEASE NOTE: Your supervisor has accepted this assignment with the understanding that you will be paid on an hourly basis. MMR strictly forbids the practice of interviewers being paid on a "flat rate" (i.e., price per interview) basis.

No interviewer may complete more than 7 Screeners.

No interviewer may complete more than 7 Main Questionnaires.

INTERVIEWER INSTRUCTIONS

IV. MALL QUOTA SHEETS

Mall Quota Control Sheets will be posted in the Mall near the area where the interviewing is taking place. After a screening/interview has been completed, record it in the appropriate space under the appropriate column on the Mall Quota Control Sheet.

V. TALLY SHEETS

You have been provided with Tally Sheets on which to record all terminates.

VI. VALIDATION FORMS

Note that Validation Forms are customized for this study and those sent are the only ones to use.

Complete, in ink, a Validation Form, representing all completed interviews. Each form should represent one Screener Interviewer's work. Note: There is also a column for recording Main Questionnaire Interviewer. You must record the Main Questionnaire Interviewer for every respondent listed on the Validation Form, even if the Main Questionnaire Interviewer is the same as the Screener Interviewer.

List each completed interview in sequential order. Fill in (PRINT) the respondent's full name, address and telephone number. Return the form(s) to your supervisor together with the corresponding completed work.

Be sure to obtain respondent's telephone number. If it is not given, obtain the phone number from your local directory, if listed.

NOTE: WE WILL BE VALIDATING UP TO 100% OF THE INTERVIEWS ON THIS STUDY

VII. MAIN QUESTIONNAIRES

MAIN QUESTIONNAIRES HAVE BEEN INTERCOLLATED. USE THEM IN THE ORDER THEY WERE SHIPPED.

VIII. QUESTIONNAIRE INSTRUCTIONS

These instructions are in addition to those on the questionnaire. Read these instructions with a copy of the questionnaire in front of you. All questions are straightforward. Questionnaire instructions, including all skip patterns, are printed ALL IN CAPS. ALL SCREENERS AND QUESTIONNAIRES MUST BE COMPLETED AS CLEARLY AND DARKLY AS POSSIBLE. DO NOT ALLOW THE RESPONDENT TO LOOK AT OR SEE THE SCREENER OR MAIN QUESTIONNAIRE AT ANY TIME.

SCREENER:

Q.A: Record response. If "Yes", terminate and tally. Erase and re-use Screener. If "No", continue.

Q.B: If "Yes", continue with Q.C. If "No", skip to Q.D.

Q.C: ASK IF "Yes" IN Q.B. If "Yes", SAY: "During this interview, please feel free to use them whenever you need them" and continue. If "No", terminate and tally. Erase and re-use Screener.

INTERVIEWER INSTRUCTIONS

- Q.D:** HAND RESPONDENT AGE CARD. If "Under 18 years of age" or "Refused", terminate and tally. Erase and re-use Screener. All others, check quota. If, open, continue with QE. Otherwise, terminate and tally. Erase and re-use Screener. TAKE BACK AGE CARD.
- Q.E:** If "No", continue. If "Yes", terminate and tally. Erase and re-use Screener.
- Q.F:** If "No", continue. If "Yes", terminate and tally. Erase and re-use Screener.
- Q.G1/2:** If no mention of "A digital camera" in either Q.G1 OR Q.G2, terminate and tally. Erase and re-use Screener. If "A digital camera", is mentioned in either Q.G1 OR Q.G2 OR BOTH, continue.
- Q.H:** If "Yes", take respondent back to interviewing area. If "No", terminate and tally. Erase and re-use Screener.

RECORD DAY OF WEEK, DATE AND TIME OF DAY SCREENER WAS COMPLETED IN THE BOX ON SCREENER PAGE S2.

RECORD RESPONDENT'S NAME, COMPLETE ADDRESS, AND PHONE NUMBER IN THE BOX ON SCREENER PAGE S3.

**TAKE RESPONDENT TO INTERVIEWING AREA.
MAIN QUESTIONNAIRE:**

RECORD RESPONDENT'S NAME IN THE BOX ON MAIN QUESTIONNAIRE PAGE M1.

Read statement.

HAND RESPONDENT CAMERA DESCRIPTION (YELLOW DOT) AND ALLOW HIM/HER SUFFICIENT TIME TO REVIEW IT THOROUGHLY BEFORE ASKING Q.1. LEAVE THE CAMERA DESCRIPTION WITH RESPONDENT.

- Q.1:** If "Price would be the same"/"Don't know", END INTERVIEW. If "Would cost less", ask Q.2.
- Q.2:** Record verbatim response. If, Don't know", ask Q. 3. All other responses in Q.2, END INTERVIEW.
- Q.3:** ASK ONLY IF "DON'T KNOW IN Q.2. HAND RESPONDENT CARD Q.3. Record response. TAKE BACK CARD Q.3. THANK RESPONDENT AND END INTERVIEW.

Make sure that all required information has been recorded on the Screener.

INTERVIEWER INSTRUCTIONS

UPON COMPLETION BE SURE TO RECORD (PRINT) MAIN QUESTIONNAIRE INTERVIEWER WHERE INDICATED ON THE MAIN QUESTIONNAIRE.

SIGN THE INTERVIEWER CERTIFICATION ON PAGE M2.

HAVE THE RESPONDENT DATE AND SIGN "RESPONDENT INTERVIEW VERIFICATION" ON PAGE M3.

STAPLE SCREENER TO TOP OF THE MAIN QUESTIONNAIRE.

IX. GENERAL INSTRUCTIONS

In order to obtain an interview of the highest quality, we must insist on the implementation of the following techniques:

1. If the respondent refuses to answer a question indicate this by writing "REF" (standing for "Refused") in the area where the answer is to be recorded.
2. Questions must be asked word-for-word, exactly as they are printed on the questionnaire or screener.
3. Questions must be asked in the order they appear on the questionnaire.
4. There should not be any explanations, interpretations or additions to a question. If a respondent does not understand a question, merely re-read it. DO NOT EXPLAIN IT.
5. When appropriate, place an "X" in the box next to the answer given by the respondent.
6. If it is necessary to make a correction, cross out the original answer and then circle the correct number or box.
7. Write legibly AND AS DARK AS POSSIBLE. If we cannot read your writing, your work cannot be used.
8. Immediately after the close of the interview, the questionnaire is to be checked for completeness, legibility, etc. Incomplete or illegible questionnaires will have to be replaced.

TO: Monroe Mendelsohn Research, Inc.
841 Broadway, 8th Floor
New York, NY 10003-4704

RE: JOB #4450C – Camera Survey

DATE: January, 2008

BRIEFING PARTICIPATION/NON-DISCLOSURE STATEMENT

This is to confirm that I, _____ currently working for (FIELD
SERVICE NAME/CITY) _____
have been thoroughly briefed on Study #4450C – Camera Survey.

I attest that I:

1. Have been personally and thoroughly briefed on this study.
2. Have conducted a minimum of 1 practice interview on this study.
3. Completely understand ALL DETAILS of this study.
4. Have read the interviewer's instructions thoroughly.

Further, I understand the importance of maintaining security and not discussing the subject with ANYONE - including friends and family. I agree to maintain the standards you have requested.

Signature of Interviewer

Signature of Supervisor

Date

MONROE MENDELSON RESEARCH, INC.
 841 BROADWAY NEW YORK, NY 10003
 (800) 223-7620 (212) 677-8971 (FAX #)

MMR #4450C
 January, 2008

CAMERA SURVEY

VALIDATION QUESTIONNAIRE

INTRODUCTION: Hello, my name is _____. Our records indicate that you recently participated in a survey. I'm not trying to sell you anything, I just need to ask you a few short questions about that survey.

1. Did you recently participate in an interview in a shopping mall where you were shown a description of a digital camera, asked to read it and then asked some questions about it?

Yes.....()

No.....()---MAKE NOTE

2. Do you work in that mall?

Yes.....()---MAKE NOTE

No.....()

3. Prior to this interview, had you been interviewed in any mall in the past three months?

Yes.....()---MAKE NOTE

No.....()

4. Do you or does anyone in your household work for an advertising agency, marketing research firm or in the production, distribution or sale of computers, cameras or printers?

Yes.....()---MAKE NOTE

No.....()

5. When you were interviewed, did you say that you had either bought a digital camera in the past 12 months and/or thought you might buy a digital camera in the next 12 months?

Yes.....()

No.....()---MAKE NOTE

6. Finally, are you 18 years of age or older?

Yes.....()

No.....()---MAKE NOTE

The following abbreviations are to be used:

NA =	No answer
BZ =	Busy
DS =	Disconnect/Not in service
AM =	Answering machine
RRN# =	Respondent reported not at that number
RF =	Refused to complete validation questions
CB =	Callback
RNA =	Respondent not available
CM =	Complete
LB =	Language barrier

Validation Report For Job # 4450 CAMERA

Column 1	2	3	4 (5+6)	5	6 (7+8)	7	8	9 (6/2)		
4450 CAMERA										
COMPLETES		With		DS/		Numbers Reached				
Total		Phone #	Total	Refused	Total	Notations	Zero	Notations	Percent Validated	
PHOENIX		52	36	5	31	30	1	60%		1
LINDA BURBANK		10	6	1	5	5	0			
SOFIA CINCO		14	13	3	10	10	0			
MARLENE LOPEZ		14	8	0	8	7	1		CLAIMS NOT INTERVIEWED	225 1
ANGEL REYES		11	7	1	6	6	0			
SHANNON ROGERS		3	2	0	2	2	0			
DETROIT		55	41	11	30	27	3	55%		3
ANN MARIE HERUBIN		5	2	0	2	2	0			
ROBERTA JENSEN		5	5	0	5	4	1		WORKS IN MALL	440 1
TARISSA KING		14	12	3	9	8	1		PAST PARTICIPATION	197 1
ELAINE MCCLOUD		7	7	1	6	5	1		WORKS IN MALL	192 1
JOYCE RAMA		16	9	2	7	7	0			
DONNIE HOWARD		8	6	5	1	1	0			
SEATTLE		53	28	1	27	27	0	51%		0
GLORIA ANDERSON		6	2	0	2	2	0			
APRIL CIPRIANO		14	9	0	9	9	0			
TED HUBBARD		19	10	1	9	9	0			
BETH KODAD		8	3	0	3	3	0			
SCOTT HUNTER		6	4	0	4	4	0			
PADUCAH		50	36	8	28	28	0	56%		0
SARAH ALSIP		12	11	3	8	8	0			
JENNA FOSTER		5	4	0	4	4	0			
CHRISTY GILMORE		13	8	2	6	6	0			
CRYSTAL LEWIS		12	10	2	8	8	0			
ROBBIE NETHERLAND		8	3	1	2	2	0			

DS = Disconnected service.

RRN# = Reported respondent not at number given.

Validation Report For Job # 4450 CAMERA

Column 1	2	3	4 (5+6)	5	6 (7+8)	7	8	9 (6/2)				
4450 CAMERA	Numbers Reached											
COMPLETES	With		Total	Refused	Total	Respondent Contacts			Percent Validated	Explanation of Notation/ Action Taken	ID #	Number Pulled
	Total	Phone #				DS/ RRN#	Zero	Notations				
<u>EAST MEADOW</u>	52	52	40	2	38	37	1	73%				4
ALICE BRUNO	2	2	0	0	0	0	0		Interview Removed	217		2
DEBBIE CAPO	7	7	5	0	5	5	0		Interview Removed	218		
JOAN CLARK	3	3	1	0	1	1	0					
CINDY DILUCIA	1	1	1	1	0	0	0		Interview Removed	216		1
LAURETTE KAUFMANN	14	14	14	0	14	14	0					
PEGGY LOCKWOOD	10	10	7	0	7	6	1		NO TO CAMERA	140		1
IRENE LOTRUGLIO	3	3	2	0	2	2	0					
ROSANNE PALMIERI	6	6	5	0	5	5	0					
GRACE RICCI	6	6	5	1	4	4	0					
<u>TRUMBULL</u>	56	56	48	9	39	39	0	70%				0
ANDREW COLAD	16	16	13	2	11	11	0					
RYAN DEMSEY	10	10	10	1	9	9	0					
KAMESHA ELSEN PETER	7	7	5	3	2	2	0					
JESSICA SMITH	11	11	8	0	8	8	0					
BILLIE JO DUNPHY	4	4	4	0	4	4	0					
LISA HARRIGAN	4	4	4	2	2	2	0					
LASHANNA ELSEN PETER	4	4	4	1	3	3	0					

DS = Disconnected service.
 RRN# = Reported respondent not at number given.

Validation Report For Job # 4450 CAMERA

Column 1	2	3	4 (5+6)	5	6 (7+8)	7	8	9 (6/2)			
4450 CAMERA											
	COMPLETES	With	Total	Refused	Total	Notations	Zero	1+	Percent	Explanation of Notation/ Action Taken	ID #
				RRN#					Validated		Pulled
									64%		0
CLEVELAND	56	56	43	7	36	36	0				
KRYSTIN COLEMAN	2	2	2	0	2	2	0				
FELICITAS FISCHER	4	4	3	0	3	3	0				
KEVIN KELLEY	9	9	6	1	5	5	0				
SARAH MAYER	17	17	11	3	8	8	0				
CASSIE OKENKA	7	7	7	0	7	7	0				
STEVE POWERS	8	8	5	3	2	2	0				
STEVE ROBBINS	5	5	5	0	5	5	0				
JOE SALA	4	4	4	0	4	4	0				

DS = Disconnected service.
RRN# = Reported respondent not at number given.

Validation Report For Job # 4450 CAMERA

Column 1	2	3	4 (5+6)	5	6 (7+8)	7	8	9 (6/2)		
4450 CAMERA										
	COMPLETES		DS/		Respondent Contacts					
	Total	With Phone #	Total	Refused	Total	Notations	1+	Percent Validated	Explanation of Notation/ Action Taken	Number Pulled
RALEIGH	52	52	36	15	21	16	5	40%		16
MORGAN BRIGHT	8	8	5	0	5	5	0			
TRACY BARRETT	12	12	9	7	2	1	1			
									SECURITY	12
									Interview Removed	485
									Interview Removed	292
									Interview Removed	293
									Interview Removed	294
									Interview Removed	295
									Interview Removed	296
									Interview Removed	480
									Interview Removed	481
									Interview Removed	482
									Interview Removed	483
									Interview Removed	484
									Interview Removed	486
KAY MITCHELL	5	5	5	3	2	2	0			
WANDA FLANAGAN	10	10	6	2	4	2	2		NO TO CAMERA	301
									NO TO CAMERA	474
LISA MCCABE	7	7	5	0	5	3	2		NO TO CAMERA	489
									SECURITY	487
NEIL PEEDIN	6	6	5	3	2	2	0			
CELESTE BENJAMIN	4	4	1	0	1	1	0			
GRAND TOTAL	426	426	308	58	250	240	10	59%		24

DS = Disconnected service.

RRN# = Reported respondent not at number given.

AGE CARD

- A. UNDER 18 YEARS OF AGE
 - B. 18-34 YEARS OF AGE
 - C. 35-49 YEARS OF AGE
 - D. 50 YEARS OF AGE AND OVER
-

AGE CARD

- A. UNDER 18 YEARS OF AGE
- B. 18-34 YEARS OF AGE
- C. 35-49 YEARS OF AGE
- D. 50 YEARS OF AGE AND OVER

**CAMERA SURVEY
SCREENER**

Screeners Interviewer: _____ 4- 5- 6- 7-

**APPROACH MALES AND FEMALES WHO APPEAR TO BE
18 YEARS OF AGE OR OLDER**

INTRODUCTION: Hello, I'm _____ representing Monroe Mendelsohn Research, a survey research company. We're conducting a survey in this area and your participation would be especially important to us. We are not selling anything. This is only a survey.

A. First, do you work in this mall?

Yes []1 → **TERMINATE AND TALLY. RE-USE SCREENER.**

8-

No []2 → **CONTINUE**

B. Do you usually wear contact lenses or eyeglasses when you read?

Yes []1 → **ASK Q.C**

9-

No []2 → **SKIP TO Q.D**

C. (IF "Yes" IN Q.B, ASK:) Do you have them with you today?

Yes []1 → **SAY: "During this interview, please feel free
to use them whenever you need them"
AND CONTINUE.**

10-

No []2 → **TERMINATE AND TALLY. RE-USE SCREENER.**

D. Which letter on this card (HAND RESPONDENT AGE CARD) includes your age? (RECORD
RESPONDENT'S AGE UNDER THE APPROPRIATE GENDER COLUMN.)

11-12

MALE FEMALE

A. Under 18	[]1	[]1
-------------------	------	------

→ **TERMINATE AND TALLY. RE-USE SCREENER.**

B. 18-34	[]2	[]2
C. 35-49	[]3	[]3
D. 50 and over	[]4	[]4

→ **CHECK AGE/GENDER SCREENING QUOTA.
IF OPEN, CONTINUE WITH Q.E.
OTHERWISE, TERMINATE AND TALLY.
RE-USE SCREENER.**

Refused	[]5	[]5
---------------	------	------

→ **TERMINATE AND TALLY. RE-USE SCREENER.**

(TAKE BACK AGE CARD.)

- E. Do you or does anyone in your household work for an advertising agency, marketing research firm, or in the production, distribution or sale of computers, cameras or printers?

Yes []1→ **TERMINATE AND TALLY. RE-USE SCREENER.**

13-

No []2→ **CONTINUE**

- F. Have you been interviewed in this or any other mall in the past three months?

Yes []1→ **TERMINATE AND TALLY. RE-USE SCREENER.**

14-

No []2→ **CONTINUE**

- G1. Which of the following products, if any, have you bought in the past 12 months? (**READ LIST. RECORD ALL "Yes" MENTIONS UNDER COL Q.G1 BELOW. IF RESPONDENT DID NOT BUY ANY OF THE LISTED PRODUCTS, 'X' "NONE OF THESE."**)

- G2. And, which of the following products do you think you might buy in the next 12 months? (**READ LIST. RECORD ALL "Yes" MENTIONS UNDER COL Q.G2 BELOW. IF RESPONDENT DOESN'T THINK HE/SHE MIGHT BUY ANY OF THE LISTED PRODUCTS, 'X' "NONE OF THESE."**)

	<u>Q.G1</u> Bought In Past 12 Months	<u>Q.G2</u> Might Buy In Next 12 Months
A laptop computer	[]1	[]1
A color ink jet printer	[]2	[]2
A digital camera	[]3	[]3
	↓	↓
	CONTINUE	CONTINUE

15-16

(**DO NOT** None of these
READ)

[]0

[]0

RESPONDENTS MUST ANSWER "A digital camera" IN Q.G1 AND/OR Q.G2 TO CONTINUE.
IF NOT "A digital camera" IN EITHER Q.G1 OR Q.G2, TERMINATE AND TALLY. RE-USE SCREENER.

- H. I have a few more questions I'd like to ask you. The interview will take about 5-10 minutes and I think you will find it interesting. Are you willing to help us out?

Yes []1→ **TAKE RESPONDENT TO INTERVIEWING AREA.**

17-

No []2→ **THANK RESPONDENT AND SAY, "Perhaps some other time you'll be able to participate. Thanks anyway!"**
TERMINATE AND TALLY. RE-USE SCREENER.

Day of the Week: _____ Date: _____
Time of Day Screener Completed: _____

RESPONDENT'S NAME: _____

ADDRESS: _____

CITY: _____

STATE: _____ ZIP: _____

PHONE: () _____

CARD Q.3

I believe that the model without the Adaptive Lighting Technology feature would be a savings of:

- A. Less than \$1.00
 - B. \$1.00 - \$4.99
 - C. \$5.00 - \$9.99
 - D. \$10.00 - \$19.99
 - E. \$20.00 or more
-

CARD Q.3

I believe that the model without the Adaptive Lighting Technology feature would be a savings of:

- A. Less than \$1.00
- B. \$1.00 - \$4.99
- C. \$5.00 - \$9.99
- D. \$10.00 - \$19.99
- E. \$20.00 or more

CAMERA SURVEY MAIN QUESTIONNAIRE

4-1

RESPONDENT'S NAME: _____

I'd like you to look at this description of a digital camera and review the information as if you were considering whether or not to buy it. After you have reviewed the product description, I will ask you a few questions. If you don't know the answer to any of my questions, please don't hesitate to say that.

HAND RESPONDENT CAMERA DESCRIPTION (YELLOW DOT) AND ALLOW HIM/HER SUFFICIENT TIME TO REVIEW IT THOROUGHLY BEFORE ASKING Q.1.
AFTER RESPONDENT HAS REVIEWED THE CAMERA DESCRIPTION,
LEAVE THE CAMERA DESCRIPTION WITH THE RESPONDENT.

1. This particular digital camera contains a feature called, "Adaptive Lighting Technology". Adaptive Lighting Technology is a breakthrough technology that enables cameras to produce photos that look more like what people see with their own eyes. It accomplishes this by balancing relationships between bright and dark areas in a photo, preserving gentle contrasts by smoothing out harsh contrasts.

If there were a digital camera model that contained all of the features of the camera whose description I just showed you, but it did not have the Adaptive Lighting Technology feature, do you think that model would cost less than the model with the Adaptive Lighting Technology feature, or would the price be the same as the model with the Adaptive Lighting Technology feature?

Would cost less []1 → **ASK Q.2**

5-

Price would be the same []2 → **END INTERVIEW**

Don't know []3 → **END INTERVIEW**

2. About how much less do you think the model without the Adaptive Lighting Technology feature would cost? (**RECORD VERBATIM RESPONSE.**)

Don't know []1 → **ASK Q.3**

6 - 8

3. (IF "DON'T KNOW" IN Q.2 HAND RESPONDENT CARD Q.3 AND ASK:) Which of the choices on this card indicates how much less you think the model without the Adaptive Lighting Technology feature would cost? Just tell me the letter of the choice you select.

I believe that the model without the Adaptive Lighting Technology feature would be a savings of:

9-

- A. Less than \$1.00 []1
B. \$1.00 - \$4.99 []2
C. \$5.00 - \$9.99 []3
D. \$10.00 - \$19.99 []4
E. \$20.00 or more []5
Don't know (RECORD IF VOLUNTEERED) []6

(TAKE BACK CARD Q.3.)

THANK RESPONDENT AND END INTERVIEW.

MAKE SURE RESPONDENT INFORMATION (NAME, ADDRESS, PHONE NUMBER)
ON SCREENER IS COMPLETE.

Main Questionnaire Interviewer: _____
(10-13)

INTERVIEWER CERTIFICATION:

I certify that I conducted this interview in accordance with my interviewer instructions.

INTERVIEWER'S SIGNATURE: _____

HAVE RESPONDENT DATE AND SIGN "RESPONDENT INTERVIEW VERIFICATION"
ON NEXT PAGE.

RESPONDENT INTERVIEW VERIFICATION

Today's Date: _____

I was interviewed on this date. During the interview I was shown a product description and questioned about it. I understand that all of the information I have supplied will remain confidential.

Respondent Signature

CAMERA SURVEY MAIN QUESTIONNAIRE

4-2

RESPONDENT'S NAME: _____

I'd like you to look at this description of a digital camera and review the information as if you were considering whether or not to buy it. After you have reviewed the product description, I will ask you a few questions. If you don't know the answer to any of my questions, please don't hesitate to say that.

HAND RESPONDENT CAMERA DESCRIPTION (YELLOW DOT) AND ALLOW HIM/HER SUFFICIENT TIME TO REVIEW IT THOROUGHLY BEFORE ASKING Q.1.
AFTER RESPONDENT HAS REVIEWED THE CAMERA DESCRIPTION,
LEAVE THE CAMERA DESCRIPTION WITH THE RESPONDENT.

1. This particular digital camera contains a feature called, "Adaptive Lighting Technology". Adaptive Lighting Technology is a breakthrough technology that enables cameras to produce photos that look more like what people see with their own eyes. It accomplishes this by balancing relationships between bright and dark areas in a photo, preserving gentle contrasts by smoothing out harsh contrasts.

If there were a digital camera model that contained all of the features of the camera whose description I just showed you, but it did not have the Adaptive Lighting Technology feature, do you think that the price would be the same as the model with the Adaptive Lighting Technology feature, or would that model cost less than the model with the Adaptive Lighting Technology feature?

Price would be the same []1 → **END INTERVIEW**

5-

Would cost less []2 → **ASK Q.2**

Don't know []3 → **END INTERVIEW**

2. About how much less do you think the model without the Adaptive Lighting Technology feature would cost? (**RECORD VERBATIM RESPONSE.**)

Don't know []1 → **ASK Q.3**

6 - 8

3. (IF "DON'T KNOW" IN Q.2 HAND RESPONDENT CARD Q.3 AND ASK:) Which of the choices on this card indicates how much less you think the model without the Adaptive Lighting Technology feature would cost? Just tell me the letter of the choice you select.

I believe that the model without the Adaptive Lighting Technology feature would be a savings of:

9-

- A. Less than \$1.00 []1
B. \$1.00 - \$4.99 []2
C. \$5.00 - \$9.99 []3
D. \$10.00 - \$19.99 []4
E. \$20.00 or more []5
Don't know (RECORD IF VOLUNTEERED) []6

(TAKE BACK CARD Q.3.)

THANK RESPONDENT AND END INTERVIEW.

MAKE SURE RESPONDENT INFORMATION (NAME, ADDRESS, PHONE NUMBER)
ON SCREENER IS COMPLETE.

Main Questionnaire Interviewer: _____
(10-13)

INTERVIEWER CERTIFICATION:

I certify that I conducted this interview in accordance with my interviewer instructions.

INTERVIEWER'S SIGNATURE: _____

HAVE RESPONDENT DATE AND SIGN "RESPONDENT INTERVIEW VERIFICATION"
ON NEXT PAGE.

RESPONDENT INTERVIEW VERIFICATION

Today's Date: _____

I was interviewed on this date. During the interview I was shown a product description and questioned about it. I understand that all of the information I have supplied will remain confidential.

Respondent Signature

MMR # 4450 C

CAMERA SURVEY**PRELIM RESULTS 1/30/08**

Q.1: ...If there were a digital camera model that contained all of the features of the camera whose description I just showed you, but it did not have the Adaptive Lighting Technology feature, do you think that model would cost less than the model with the Adaptive Lighting Technology feature, or would the price be the same as the model with the Adaptive Lighting Technology feature?

	Total Respondents	
	(195)	(100)
	#	%
Would cost less	166	85
Price would be the same	22	11
Don't know	7	4

Q.2: About how much less do you think the model without the Adaptive Lighting Technology feature would cost?

	Total Respondents	
	(195)	(100)
	#	%
Don't know	31	16

See verbatims for rest of open ended responses

Q.3: Which of the choices on this card indicates how much less you think the model without the Adaptive Lighting Technology feature would cost? Just tell me the letter of the choice you select.

	Total Respondents	
	(195)	(100)
	#	%
A. Less than \$1.00	-	-
B. \$1.00 - \$4.99	-	-
C. \$5.00 - \$9.99	1	1
D. \$10.00 - \$19.99	7	4
E. \$20.00 or more	22	11
Don't know	1	1

CAMERA SURVEY: TOTAL RESULTS PRIOR TO VALIDATION 2/6/08

Q.1: ...If there were a digital camera model that contained all of the features of the camera whose description I just showed you, but it did not have the Adaptive Lighting Technology feature, do you think that model would cost less than the model with the Adaptive Lighting Technology feature, or would the price be the same as the model with the Adaptive Lighting Technology feature?

	Total Respondents	
	(412)	(100)
	#	%
Would cost less	349	85
Price would be the same	50	12
Don't know	13	3

Q.2: About how much less do you think the model without the Adaptive Lighting Technology feature would cost?

	Total Respondents	
	(412)	(100)
	#	%
Don't know	61	15
MEAN	\$45.26	
MEDIAN	\$45.00	

See verbatims for individual responses

Q.3: Which of the choices on this card indicates how much less you think the model without the Adaptive Lighting Technology feature would cost? Just tell me the letter of the choice you select.

	Total Respondents	
	(412)	(100)
	#	%
A. Less than \$1.00	-	-
B. \$1.00 - \$4.99	1	*
C. \$5.00 - \$9.99	4	1
D. \$10.00 - \$19.99	13	3
E. \$20.00 or more	40	10
Don't know	3	1

* = Less than 0.5%

Q.1: ...If there were a digital camera model that contained all of the features of the camera whose description I just showed you, but it did not have the Adaptive Lighting Technology feature, do you think that model would cost less than the model with the Adaptive Lighting Technology feature, or would the price be the same as the model with the Adaptive Lighting Technology feature?

	Total Respondents	
	(402)	(100)
	#	%
Would cost less	345	86
Price would be the same	45	11
Don't know	12	3

Q.2: About how much less do you think the model without the Adaptive Lighting Technology feature would cost?

	Total Respondents	
	(402)	(100)
	#	%
Don't know	59	15
MEAN	\$44.93	
MEDIAN	\$50.00	

See verbatims for individual responses

Q.3: Which of the choices on this card indicates how much less you think the model without the Adaptive Lighting Technology feature would cost? Just tell me the letter of the choice you select.

	Total Respondents	
	(402)	(100)
	#	%
A. Less than \$1.00	-	-
B. \$1.00 - \$4.99	1	*
C. \$5.00 - \$9.99	4	1
D. \$10.00 - \$19.99	13	3
E. \$20.00 or more	38	9
Don't know	3	1

* = Less than 0.5%

MMR # 4450 C RESPONDENT DATA YELLOW Q'RES					
CAMERA SURVEY: TOTAL RESPONDENTS FINAL					
				TR WITH VALUES N = 383	
Q're ID #	Q.1	Q.2 Verbatim	Q.3	VALUE	# CUM %
102	same price			\$0.00	1 0.261097
107	same price			\$0.00	2 0.522193
120	same price			\$0.00	3 0.78329
133	same price			\$0.00	4 1.044386
136	same price			\$0.00	5 1.305483
138	same price			\$0.00	6 1.56658
139	same price			\$0.00	7 1.827676
141	same price			\$0.00	8 2.088773
166	same price			\$0.00	9 2.349869
171	same price			\$0.00	10 2.610966
175	same price			\$0.00	11 2.872063
208	same price			\$0.00	12 3.133159
212	same price			\$0.00	13 3.394256
215	same price			\$0.00	14 3.655352
224	same price			\$0.00	15 3.916449
231	same price			\$0.00	16 4.177546
242	same price			\$0.00	17 4.438642
290	same price			\$0.00	18 4.699739
310	same price			\$0.00	19 4.960836
312	same price			\$0.00	20 5.221932
315	same price			\$0.00	21 5.483029
322	same price			\$0.00	22 5.744125
326	same price			\$0.00	23 6.005222
337	same price			\$0.00	24 6.266319
359	same price			\$0.00	25 6.527415
383	same price			\$0.00	26 6.788512
384	same price			\$0.00	27 7.049608
404	same price			\$0.00	28 7.310705
406	same price			\$0.00	29 7.571802
419	same price			\$0.00	30 7.832898
421	same price			\$0.00	31 8.093995
425	same price			\$0.00	32 8.355091
430	same price			\$0.00	33 8.616188
436	same price			\$0.00	34 8.877285
437	same price			\$0.00	35 9.138381
443	same price			\$0.00	36 9.399478
444	same price			\$0.00	37 9.660574
449	same price			\$0.00	38 9.921671
452	same price			\$0.00	39 10.18277
458	same price			\$0.00	40 10.44386
488	same price			\$0.00	41 10.70496
494	same price			\$0.00	42 10.96606
500	same price			\$0.00	43 11.22715
505	same price			\$0.00	44 11.48825
528	same price			\$0.00	45 11.74935
462	cost less	Don't know	\$1.00 - \$4.99	\$1.00	46 12.01044
341	cost less	\$5.00		\$5.00	47 12.27154
108	cost less	Don't know	\$5.00 - \$9.99	\$5.00	48 12.53264
441	cost less	Don't know	\$5.00 - \$9.99	\$5.00	49 12.79373
518	cost less	Don't know	\$5.00 - \$9.99	\$5.00	50 13.05483
525	cost less	Don't know	\$5.00 - \$9.99	\$5.00	51 13.31593

MMR # 4450 C RESPONDENT DATA YELLOW Q'RES					
CAMERA SURVEY: TOTAL RESPONDENTS FINAL					
TR WITH VALUES N = 383					
Q're ID #	Q.1	Q.2 Verbatim	Q.3	VALUE	# CUM %
244	cost less	\$10.00		\$10.00	52 13.57702
280	cost less	\$10.00		\$10.00	53 13.83812
281	cost less	\$10.00		\$10.00	54 14.09922
287	cost less	\$10.00		\$10.00	55 14.36031
104	cost less	Don't know	\$10.00 - \$19.99	\$10.00	56 14.62141
115	cost less	Don't know	\$10.00 - \$19.99	\$10.00	57 14.88251
135	cost less	Don't know	\$10.00 - \$19.99	\$10.00	58 15.1436
237	cost less	Don't know	\$10.00 - \$19.99	\$10.00	59 15.4047
238	cost less	Don't know	\$10.00 - \$19.99	\$10.00	60 15.6658
249	cost less	Don't know	\$10.00 - \$19.99	\$10.00	61 15.92689
276	cost less	Don't know	\$10.00 - \$19.99	\$10.00	62 16.18799
317	cost less	Don't know	\$10.00 - \$19.99	\$10.00	63 16.44909
410	cost less	Don't know	\$10.00 - \$19.99	\$10.00	64 16.71018
445	cost less	Don't know	\$10.00 - \$19.99	\$10.00	65 16.97128
446	cost less	Don't know	\$10.00 - \$19.99	\$10.00	66 17.23238
447	cost less	Don't know	\$10.00 - \$19.99	\$10.00	67 17.49347
522	cost less	Don't know	\$10.00 - \$19.99	\$10.00	68 17.75457
269	cost less	About 10 to 15 dollars less.		\$12.50	69 18.01567
300	cost less	\$15.00		\$15.00	70 18.27676
386	cost less	About 15 dollars		\$15.00	71 18.53786
388	cost less	Like maybe 19 something		\$19.00	72 18.79896
285	cost less	\$19.99		\$19.99	73 19.06005
174	cost less	20		\$20.00	74 19.32115
213	cost less	\$20.00		\$20.00	75 19.58225
247	cost less	\$20		\$20.00	76 19.84334
268	cost less	\$20.00		\$20.00	77 20.10444
277	cost less	\$20.00		\$20.00	78 20.36554
282	cost less	\$20.00		\$20.00	79 20.62663
298	cost less	\$20.00		\$20.00	80 20.88773
379	cost less	20.00		\$20.00	81 21.14883
398	cost less	20.00		\$20.00	82 21.40992
403	cost less	\$20		\$20.00	83 21.67102
420	cost less	20.00		\$20.00	84 21.93211
459	cost less	20.00		\$20.00	85 22.19321
468	cost less	\$20.00		\$20.00	86 22.45431
471	cost less	\$20.00		\$20.00	87 22.7154
491	cost less	20.00		\$20.00	88 22.9765
507	cost less	\$20.00		\$20.00	89 23.2376
532	cost less	\$20		\$20.00	90 23.49869
472	cost less	\$20 less		\$20.00	91 23.75979
304	cost less	\$20 or less		\$20.00	92 24.02089
170	cost less	20 dollars		\$20.00	93 24.28198
103	cost less	Don't know	\$20.00 or more	\$20.00	94 24.54308
106	cost less	Don't know	\$20.00 or more	\$20.00	95 24.80418
110	cost less	Don't know	\$20.00 or more	\$20.00	96 25.06527
111	cost less	Don't know	\$20.00 or more	\$20.00	97 25.32637
132	cost less	Don't know	\$20.00 or more	\$20.00	98 25.58747
147	cost less	Don't know	\$20.00 or more	\$20.00	99 25.84856
150	cost less	Don't know	\$20.00 or more	\$20.00	100 26.10966
189	cost less	Don't know	\$20.00 or more	\$20.00	101 26.37076
190	cost less	Don't know	\$20.00 or more	\$20.00	102 26.63185

MMR # 4450 C RESPONDENT DATA YELLOW Q'RES						
CAMERA SURVEY: TOTAL RESPONDENTS FINAL						
				TR WITH VALUES N = 383		
Q're ID #	Q.1	Q.2 Verbatim	Q.3	VALUE	#	CUM %
193	cost less	Don't know	\$20.00 or more	\$20.00	103	26.89295
194	cost less	Don't know	\$20.00 or more	\$20.00	104	27.15405
195	cost less	Don't know	\$20.00 or more	\$20.00	105	27.41514
210	cost less	Don't know	\$20.00 or more	\$20.00	106	27.67624
211	cost less	Don't know	\$20.00 or more	\$20.00	107	27.93734
214	cost less	Don't know	\$20.00 or more	\$20.00	108	28.19843
226	cost less	Don't know	\$20.00 or more	\$20.00	109	28.45953
239	cost less	Don't know	\$20.00 or more	\$20.00	110	28.72063
243	cost less	Don't know	\$20.00 or more	\$20.00	111	28.98172
253	cost less	Don't know	\$20.00 or more	\$20.00	112	29.24282
258	cost less	Don't know	\$20.00 or more	\$20.00	113	29.50392
264	cost less	Don't know	\$20.00 or more	\$20.00	114	29.76501
303	cost less	Don't know	\$20.00 or more	\$20.00	115	30.02611
311	cost less	Don't know	\$20.00 or more	\$20.00	116	30.28721
316	cost less	Don't know	\$20.00 or more	\$20.00	117	30.5483
354	cost less	Don't know	\$20.00 or more	\$20.00	118	30.8094
362	cost less	Don't know	\$20.00 or more	\$20.00	119	31.0705
382	cost less	Don't know	\$20.00 or more	\$20.00	120	31.33159
393	cost less	Don't know	\$20.00 or more	\$20.00	121	31.59269
401	cost less	Don't know	\$20.00 or more	\$20.00	122	31.85379
423	cost less	Don't know	\$20.00 or more	\$20.00	123	32.11488
460	cost less	Don't know	\$20.00 or more	\$20.00	124	32.37598
464	cost less	Don't know	\$20.00 or more	\$20.00	125	32.63708
466	cost less	Don't know	\$20.00 or more	\$20.00	126	32.89817
473	cost less	Don't know	\$20.00 or more	\$20.00	127	33.15927
495	cost less	Don't know	\$20.00 or more	\$20.00	128	33.42037
503	cost less	Don't know	\$20.00 or more	\$20.00	129	33.68146
510	cost less	Don't know	\$20.00 or more	\$20.00	130	33.94256
515	cost less	Don't know	\$20.00 or more	\$20.00	131	34.20366
307	cost less	Twenty dollars		\$20.00	132	34.46475
146	cost less	\$25		\$25.00	133	34.72585
305	cost less	25		\$25.00	134	34.98695
358	cost less	\$25.00		\$25.00	135	35.24804
369	cost less	25.00		\$25.00	136	35.50914
397	cost less	25.00		\$25.00	137	35.77023
526	cost less	\$25.00		\$25.00	138	36.03133
509	cost less	\$20-30		\$25.00	139	36.29243
352	cost less	\$25 less		\$25.00	140	36.55352
167	cost less	20.00 to 30.00		\$25.00	141	36.81462
134	cost less	In between the 20s		\$25.00	142	37.07572
229	cost less	Maybe 25 dollars less.		\$25.00	143	37.33681
323	cost less	Probably 25 bucks		\$25.00	144	37.59791
380	cost less	29.95		\$29.95	145	37.85901
112	cost less	\$30		\$30.00	146	38.1201
122	cost less	\$30		\$30.00	147	38.3812
187	cost less	30		\$30.00	148	38.6423
204	cost less	\$30.00		\$30.00	149	38.90339
205	cost less	\$30.00		\$30.00	150	39.16449
209	cost less	\$30.00		\$30.00	151	39.42559
240	cost less	\$30		\$30.00	152	39.68668
255	cost less	\$30.00		\$30.00	153	39.94778

MMR # 4450 C RESPONDENT DATA YELLOW Q'RES					
CAMERA SURVEY: TOTAL RESPONDENTS FINAL					
				TR WITH VALUES N = 383	
Q're ID #	Q.1	Q.2 Verbatim	Q.3	VALUE	# CUM %
308	cost less	30		\$30.00	154 40.20888
356	cost less	\$30		\$30.00	155 40.46997
367	cost less	30.00		\$30.00	156 40.73107
375	cost less	30.00		\$30.00	157 40.99217
409	cost less	\$30.00		\$30.00	158 41.25326
435	cost less	30.00		\$30.00	159 41.51436
448	cost less	\$30.00		\$30.00	160 41.77546
450	cost less	\$30.00		\$30.00	161 42.03655
454	cost less	30.00		\$30.00	162 42.29765
504	cost less	\$30.00		\$30.00	163 42.55875
387	cost less	Probably 30 bucks		\$30.00	164 42.81984
411	cost less	30.00 - 40.00 bucks		\$35.00	165 43.08094
453	cost less	About 35.00		\$35.00	166 43.34204
232	cost less	I think it would cost thirty five dollars less.		\$35.00	167 43.60313
131	cost less	Probably 20-50 dollars		\$35.00	168 43.86423
267	cost less	\$25.00 to \$50.00		\$37.50	169 44.12533
455	cost less	25 to 50 bucks difference		\$37.50	170 44.38642
266	cost less	25 to 50 dollars less		\$37.50	171 44.64752
376	cost less	25.00 to 50.00		\$37.50	172 44.90862
306	cost less	35 or 40 less		\$37.50	173 45.16971
119	cost less	\$40		\$40.00	174 45.43081
199	cost less	\$40.00		\$40.00	175 45.69191
241	cost less	\$40.00		\$40.00	176 45.953
251	cost less	\$40		\$40.00	177 46.2141
262	cost less	\$40		\$40.00	178 46.4752
355	cost less	\$40		\$40.00	179 46.73629
461	cost less	\$40 less		\$40.00	180 46.99739
465	cost less	\$40 less		\$40.00	181 47.25849
377	cost less	40.00 less		\$40.00	182 47.51958
381	cost less	40.00 less		\$40.00	183 47.78068
299	cost less	Probably 40 bucks		\$40.00	184 48.04178
176	cost less	Probably 40 dollars		\$40.00	185 48.30287
350	cost less	\$45 less		\$45.00	186 48.56397
309	cost less	40 or 50 less		\$45.00	187 48.82507
234	cost less	40/50 dollars less		\$45.00	188 49.08616
467	cost less	\$49.95		\$49.95	189 49.34726
186	cost less	49.99		\$49.99	190 49.60836
114	cost less	\$50		\$50.00	191 49.86945
116	cost less	\$50		\$50.00	192 50.13055
117	cost less	\$50		\$50.00	193 50.39164
118	cost less	\$50		\$50.00	194 50.65274
125	cost less	\$50		\$50.00	195 50.91384
151	cost less	\$50		\$50.00	196 51.17493
153	cost less	\$50		\$50.00	197 51.43603
155	cost less	\$50		\$50.00	198 51.69713
164	cost less	50		\$50.00	199 51.95822
168	cost less	\$50		\$50.00	200 52.21932
169	cost less	50		\$50.00	201 52.48042
181	cost less	50		\$50.00	202 52.74151
196	cost less	\$50.00		\$50.00	203 53.00261
200	cost less	\$50.00		\$50.00	204 53.26371

MMR # 4450 C RESPONDENT DATA YELLOW Q'RES						
CAMERA SURVEY: TOTAL RESPONDENTS FINAL						
				TR WITH VALUES N = 383		
Q're ID #	Q.1	Q.2 Verbatim	Q.3	VALUE	#	CUM %
207	cost less	\$50.00		\$50.00	205	53.5248
252	cost less	\$50		\$50.00	206	53.7859
256	cost less	\$50		\$50.00	207	54.047
260	cost less	\$50		\$50.00	208	54.30809
261	cost less	\$50		\$50.00	209	54.56919
265	cost less	\$50		\$50.00	210	54.83029
271	cost less	\$50.00		\$50.00	211	55.09138
272	cost less	\$50.00		\$50.00	212	55.35248
273	cost less	\$50.00		\$50.00	213	55.61358
275	cost less	\$50.00		\$50.00	214	55.87467
284	cost less	\$50.00		\$50.00	215	56.13577
302	cost less	\$50.00		\$50.00	216	56.39687
334	cost less	\$50		\$50.00	217	56.65796
347	cost less	\$50		\$50.00	218	56.91906
348	cost less	\$50		\$50.00	219	57.18016
361	cost less	50.00		\$50.00	220	57.44125
363	cost less	50.00		\$50.00	221	57.70235
365	cost less	50.00		\$50.00	222	57.96345
366	cost less	50.00		\$50.00	223	58.22454
368	cost less	50.00		\$50.00	224	58.48564
370	cost less	50.00		\$50.00	225	58.74674
371	cost less	50.00		\$50.00	226	59.00783
372	cost less	50.00		\$50.00	227	59.26893
374	cost less	50.00		\$50.00	228	59.53003
396	cost less	50.00		\$50.00	229	59.79112
400	cost less	50.00		\$50.00	230	60.05222
405	cost less	\$50		\$50.00	231	60.31332
407	cost less	\$50		\$50.00	232	60.57441
408	cost less	\$50.00		\$50.00	233	60.83551
412	cost less	\$50.00		\$50.00	234	61.09661
413	cost less	\$50		\$50.00	235	61.3577
424	cost less	\$50.00		\$50.00	236	61.6188
426	cost less	\$50.00		\$50.00	237	61.8799
428	cost less	\$50.00		\$50.00	238	62.14099
433	cost less	\$50.00		\$50.00	239	62.40209
438	cost less	\$50.00		\$50.00	240	62.66319
451	cost less	\$50.00		\$50.00	241	62.92428
469	cost less	\$50.00		\$50.00	242	63.18538
470	cost less	\$50.00		\$50.00	243	63.44648
479	cost less	50.00		\$50.00	244	63.70757
492	cost less	50.00		\$50.00	245	63.96867
496	cost less	\$50.00		\$50.00	246	64.22977
506	cost less	\$50.00		\$50.00	247	64.49086
508	cost less	\$50.00		\$50.00	248	64.75196
512	cost less	\$50		\$50.00	249	65.01305
516	cost less	50.00		\$50.00	250	65.27415
527	cost less	\$50.00		\$50.00	251	65.53525
529	cost less	\$50.00		\$50.00	252	65.79634
531	cost less	\$50.00		\$50.00	253	66.05744
535	cost less	\$50.00		\$50.00	254	66.31854
538	cost less	\$50.00		\$50.00	255	66.57963

MMR # 4450 C RESPONDENT DATA YELLOW Q'RES					
CAMERA SURVEY: TOTAL RESPONDENTS FINAL					
TR WITH VALUES N = 383					
Q're ID #	Q.1	Q.2 Verbatim	Q.3	VALUE	# CUM %
351	cost less	\$50 less		\$50.00	256 66.84073
227	cost less	\$50.00 Less		\$50.00	257 67.10183
270	cost less	\$50.00 less		\$50.00	258 67.36292
502	cost less	\$50.00 less		\$50.00	259 67.62402
519	cost less	\$50.00 less		\$50.00	260 67.88512
521	cost less	\$50.00 less		\$50.00	261 68.14621
313	cost less	50 bucks		\$50.00	262 68.40731
101	cost less	50 dollars		\$50.00	263 68.66841
236	cost less	50 dollars		\$50.00	264 68.9295
137	cost less	50 dollars less		\$50.00	265 69.1906
178	cost less	50 dollars less		\$50.00	266 69.4517
378	cost less	50.00 at least		\$50.00	267 69.71279
219	cost less	50.00 Less		\$50.00	268 69.97389
235	cost less	About \$50 or less		\$50.00	269 70.23499
172	cost less	About 50 dollars less		\$50.00	270 70.49608
263	cost less	About fifty bucks		\$50.00	271 70.75718
325	cost less	At least 50 bucks		\$50.00	272 71.01828
324	cost less	I think it would drop 50 bucks		\$50.00	273 71.27937
230	cost less	It would be fifty dollars less.		\$50.00	274 71.54047
537	cost less	Like 50 bucks		\$50.00	275 71.80157
130	cost less	maybe \$50		\$50.00	276 72.06266
498	cost less	Probably \$50 less		\$50.00	277 72.32376
390	cost less	Probably about 50 bucks		\$50.00	278 72.58486
320	cost less	Probably like 50 dollars		\$50.00	279 72.84595
127	cost less	\$55		\$55.00	280 73.10705
254	cost less	\$50 - \$60		\$55.00	281 73.36815
533	cost less	\$50 - \$60		\$55.00	282 73.62924
463	cost less	50 or 60 less		\$55.00	283 73.89034
233	cost less	It would cost 50 or 60 dollars less.		\$55.00	284 74.15144
163	cost less	60		\$60.00	285 74.41253
183	cost less	60		\$60.00	286 74.67363
201	cost less	\$60.00		\$60.00	287 74.93473
477	cost less	60.00		\$60.00	288 75.19582
385	cost less	50 to \$70 less		\$60.00	289 75.45692
319	cost less	Maybe 60 bucks less		\$60.00	290 75.71802
514	cost less	\$50-\$75		\$62.50	291 75.97911
245	cost less	25% less		\$62.50	292 76.24021
259	cost less	50 - 75 less		\$62.50	293 76.50131
457	cost less	I'd say 65 dollars		\$65.00	294 76.7624
161	cost less	\$70		\$70.00	295 77.0235
198	cost less	\$70.00		\$70.00	296 77.2846
328	cost less	\$70		\$70.00	297 77.54569
493	cost less	\$70.00		\$70.00	298 77.80679
124	cost less	About \$70		\$70.00	299 78.06789
154	cost less	\$75		\$75.00	300 78.32898
156	cost less	\$75		\$75.00	301 78.59008
184	cost less	75		\$75.00	302 78.85117
346	cost less	\$75		\$75.00	303 79.11227
357	cost less	\$75		\$75.00	304 79.37337
360	cost less	75.00		\$75.00	305 79.63446
402	cost less	\$75		\$75.00	306 79.89556

MMR # 4450 C RESPONDENT DATA YELLOW Q'RES					
CAMERA SURVEY: TOTAL RESPONDENTS FINAL					
			TR WITH VALUES N = 383		
Q're ID #	Q.1	Q.2 Verbatim Q.3	VALUE	#	CUM %
427	cost less	\$75.00	\$75.00	307	80.15666
431	cost less	\$75.00	\$75.00	308	80.41775
399	cost less	\$70 - \$80	\$75.00	309	80.67885
343	cost less	\$75 less	\$75.00	310	80.93995
318	cost less	About 75.00	\$75.00	311	81.20104
297	cost less	Maybe about \$75	\$75.00	312	81.46214
129	cost less	maybe like 50 to 100 dollars	\$75.00	313	81.72324
389	cost less	Maybe like 50 to 100 dollars less	\$75.00	314	81.98433
391	cost less	Probably 75 bucks	\$75.00	315	82.24543
173	cost less	Probably 75 dollars	\$75.00	316	82.50653
392	cost less	Probably about 75 dollars less	\$75.00	317	82.76762
145	cost less	\$79.99 less	\$79.99	318	83.02872
121	cost less	\$80	\$80.00	319	83.28982
179	cost less	\$80.00	\$80.00	320	83.55091
327	cost less	\$80	\$80.00	321	83.81201
330	cost less	\$80	\$80.00	322	84.07311
331	cost less	\$80	\$80.00	323	84.3342
333	cost less	\$80	\$80.00	324	84.5953
336	cost less	\$80	\$80.00	325	84.8564
497	cost less	\$80	\$80.00	326	85.11749
345	cost less	\$80 less	\$80.00	327	85.37859
228	cost less	\$80.00 less	\$80.00	328	85.63969
536	cost less	Maybe like \$80	\$80.00	329	85.90078
335	cost less	\$90	\$90.00	330	86.16188
180	cost less	\$80 to \$100	\$90.00	331	86.42298
394	cost less	About 80 to a hundred bucks	\$90.00	332	86.68407
123	cost less	\$100	\$100.00	333	86.94517
126	cost less	\$100	\$100.00	334	87.20627
128	cost less	\$100	\$100.00	335	87.46736
143	cost less	\$100	\$100.00	336	87.72846
144	cost less	\$100	\$100.00	337	87.98956
148	cost less	\$100	\$100.00	338	88.25065
149	cost less	\$100	\$100.00	339	88.51175
152	cost less	\$100	\$100.00	340	88.77285
159	cost less	\$100	\$100.00	341	89.03394
162	cost less	\$100	\$100.00	342	89.29504
165	cost less	100	\$100.00	343	89.55614
177	cost less	100	\$100.00	344	89.81723
185	cost less	100	\$100.00	345	90.07833
191	cost less	\$100	\$100.00	346	90.33943
203	cost less	\$100.00	\$100.00	347	90.60052
206	cost less	\$100.00	\$100.00	348	90.86162
246	cost less	\$100	\$100.00	349	91.12272
248	cost less	\$100	\$100.00	350	91.38381
250	cost less	\$100	\$100.00	351	91.64491
329	cost less	\$100	\$100.00	352	91.90601
332	cost less	\$100	\$100.00	353	92.1671
339	cost less	\$100	\$100.00	354	92.4282
342	cost less	\$100	\$100.00	355	92.6893
353	cost less	\$100	\$100.00	356	92.95039
373	cost less	100.00	\$100.00	357	93.21149

MMR # 4450 C RESPONDENT DATA YELLOW Q'RES					
CAMERA SURVEY: TOTAL RESPONDENTS FINAL					
			TR WITH VALUES N = 383		
Q're ID #	Q.1	Q.2 Verbatim	Q.3	VALUE	# CUM %
414	cost less	\$100.00		\$100.00	358 93.47258
415	cost less	\$100.00		\$100.00	359 93.73368
429	cost less	\$100.00		\$100.00	360 93.99478
432	cost less	\$100.00		\$100.00	361 94.25587
434	cost less	\$100.00		\$100.00	362 94.51697
442	cost less	\$100		\$100.00	363 94.77807
490	cost less	100.00		\$100.00	364 95.03916
530	cost less	\$100.00		\$100.00	365 95.30026
534	cost less	\$100		\$100.00	366 95.56136
539	cost less	\$100.00		\$100.00	367 95.82245
344	cost less	\$100 less		\$100.00	368 96.08355
349	cost less	\$100 less		\$100.00	369 96.34465
257	cost less	\$100.00 less		\$100.00	370 96.60574
517	cost less	\$100.00 less		\$100.00	371 96.86684
524	cost less	\$100.00 less		\$100.00	372 97.12794
395	cost less	100 bucks less		\$100.00	373 97.38903
182	cost less	About 100 dollars less		\$100.00	374 97.65013
523	cost less	\$125 less		\$125.00	375 97.91123
501	cost less	\$139.95 less		\$139.95	376 98.17232
158	cost less	\$150		\$150.00	377 98.43342
202	cost less	\$150		\$150.00	378 98.69452
288	cost less	\$150.00		\$150.00	379 98.95561
364	cost less	150.00		\$150.00	380 99.21671
340	cost less	About \$150 less		\$150.00	381 99.47781
220	cost less	Probably [sic] 150.00 less then the one with the technology.		\$150.00	382 99.7389
511	cost less	150-200		\$175.00	383 100
		SUM:		\$17,207.32	
		MEAN:		\$44.93	
		MEDIAN:		\$50.00	

MMR # 4450 C RESPONDENT DATA YELLOW Q'RES					
CAMERA SURVEY: TOTAL RESPONDENTS FINAL					
			TR WITH VALUES N = 383		
Q're ID #	Q.1	Q.2 Verbatim	Q.3	VALUE	# CUM %
FOLLOWING RESP NOT IN MEAN/MEDIAN (Q.1/2 = Don't know)					
314	dk			NA	
321	dk			NA	
422	dk			NA	
478	dk			NA	
338	dk			NA	
439	dk			NA	
113	dk			NA	
222	dk			NA	
223	dk			NA	
109	dk			NA	
142	dk			NA	
221	dk			NA	
475	cost less	Don't know	Don't know	NA	
476	cost less	Don't know	Don't know	NA	
160	cost less	Don't know	Don't know	NA	
FOLLOWING RESP NOT IN MEAN/MEDIAN (Q.2 = questionable response)					
105	cost less	\$200.00		NA	
456	cost less	Maybe like 200, probably 200.		NA	
274	cost less	\$225.00		NA	
188	cost less	249 dollars		NA	

Exhibit M

REDACTED
IN ITS ENTIRETY

Exhibit N

Walter McCullough

Page 1

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IN THE UNITED STATES DISTRICT COURT

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FOR THE DISTRICT OF DELAWARE

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POLAROID CORPORATION,

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Plaintiff,

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vs.

No. 6-738 (SLR)

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HEWLETT-PACKARD COMPANY,

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Defendant.

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VIDEOTAPED DEPOSITION OF

14

WALTER J. McCULLOUGH

15

New York, New York

16

Tuesday, May 6, 2008

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22

23

24 Reported by:

SHAUNA STOLTZ-LAURIE

25 CSR NO. 810490

JOB NO. 202738

Walter McCullough

<p style="text-align: right;">Page 2</p> <p>1 2 3 4 5 May 1, 2008 6 9:08 a.m. 7 8 Videotaped deposition of WALTER J. 9 McCULLOUGH, held at the offices of 10 Kirkland & Ellis LLP, 153 East 53rd 11 Street, New York, New York, pursuant to 12 notice, before Shauna Stoltz-Laurie, a 13 Notary Public of the State of New York. 14 15 16 17 18 19 20 21 22 23 24 25</p>	<p style="text-align: right;">Page 4</p> <p>1 2 THE VIDEOGRAPHER: This is tape 3 number one of the videotaped deposition 4 of Walter J. McCullough in the matter of 5 Polaroid Corporation versus 6 Hewlett-Packard Company, in the United 7 States District Court for the District 8 of Delaware, CA number 6-738 (SLR). 9 This deposition is being held at 10 Kirkland & Ellis LLP, 153 East 53rd 11 Street, New York, New York on May 6, 12 2008. The time on the video screen is 13 9:09 a.m. 14 My name is Lee Bowry, I am the 15 legal videographer with Shari Moss & 16 Associates. The court reporter is 17 Shauna Stoltz-Laurie. 18 Will counsel please introduce 19 themselves for the record. 20 MR. BUCHANAN: Good morning. My 21 name is Robert Buchanan from Choate Hall 22 & Stewart. I represent Hewlett-Packard 23 Company, and I'll be conducting the 24 deposition. 25 MS. KINGSBURY: Good morning. My</p>
<p style="text-align: right;">Page 3</p> <p>1 2 APPEARANCES: 3 4 Kirkland & Ellis LLP 5 Attorneys for Plaintiff 6 200 East Randolph Drive 7 Chicago, Illinois 60601 8 BY: COLBY ANNE KINGSBURY, ESQ. 9 10 CHOATE HALL & STEWART LLP 11 Attorneys for Defendant 12 Two International Place 13 Boston, Massachusetts 02110 14 BY: ROBERT M. BUCHANAN, JR., ESQ. 15 16 ALSO PRESENT: 17 LEE BOWRY, Videographer 18 19 20 21 22 23 24 25</p>	<p style="text-align: right;">Page 5</p> <p>1 McCullough 2 name is Colby Anne Kingsbury. I'm from 3 Kirkland & Ellis, and I represent 4 Polaroid, and I'm here on behalf of Mr. 5 McCullough as well. 6 THE VIDEOGRAPHER: Will the court 7 reporter please swear in the witness. 8 WALTER J. McCULLOUGH, 9 called as a witness, having been duly 10 sworn by a Notary Public, was examined 11 and testified as follows: 12 EXAMINATION BY 13 MR. BUCHANAN: 14 Q. Good morning, Mr. McCullough. 15 A. Good morning, Mr. Buchanan. 16 Q. We met earlier. 17 Would you spell your last name in 18 full, please? 19 A. Yes. M-c capital C-u-l-l-o-u-g-h. 20 Q. And have you been retained on 21 behalf of Polaroid in this case? 22 A. Yes, I have. 23 Q. And have you been retained by the 24 firm of Kirkland & Ellis on behalf of 25 Polaroid?</p>

2 (Pages 2 to 5)

Walter McCullough

<p style="text-align: right;">Page 18</p> <p>1 McCullough</p> <p>2 were able to put that out of your mind</p> <p>3 entirely when you wrote your report about</p> <p>4 printers.</p> <p>5 A. Yes.</p> <p>6 It's completely unrelated, in terms</p> <p>7 of my point of view.</p> <p>8 Q. And what do you mean, they are</p> <p>9 unrelated?</p> <p>10 A. They're two completely different</p> <p>11 surveys on two different products, and when I</p> <p>12 was working on the printer report I was</p> <p>13 thinking in terms of the results of the two</p> <p>14 printer surveys I did; I was not thinking at</p> <p>15 all about the camera survey, because that was</p> <p>16 -- from my point of view, I was told that</p> <p>17 this was taken off -- off the table, so to</p> <p>18 speak.</p> <p>19 Q. Did you yourself design the</p> <p>20 questions that were asked as a printer</p> <p>21 survey?</p> <p>22 A. Yes.</p> <p>23 Q. Did you yourself design the</p> <p>24 questions that were asked in the camera</p> <p>25 survey?</p>	<p style="text-align: right;">Page 20</p> <p>1 McCullough</p> <p>2 sought people to ask questions about the</p> <p>3 printers, also seek people to ask -- answer</p> <p>4 questions about the cameras?</p> <p>5 A. Let me think about that.</p> <p>6 I think they were separate</p> <p>7 screeners. But it goes back a ways, so I'm</p> <p>8 not positive. I think they were separately</p> <p>9 done. But it was an along time ago, and I</p> <p>10 forgot the detail of it.</p> <p>11 Q. Well, were there sent to you any</p> <p>12 documents that reflect responses that people</p> <p>13 indicative about cameras?</p> <p>14 A. You mean -- you mean the</p> <p>15 interviews?</p> <p>16 Q. Yes.</p> <p>17 A. Yes.</p> <p>18 Q. And so -- now, about printers, I've</p> <p>19 received from counsel about what in my --</p> <p>20 what fills about one full box of cartons of</p> <p>21 questionnaire responses --</p> <p>22 A. Right.</p> <p>23 Q. -- containing the printer survey.</p> <p>24 A. Right.</p> <p>25 Q. Are you familiar with those?</p>
<p style="text-align: right;">Page 19</p> <p>1 McCullough</p> <p>2 A. Yes.</p> <p>3 Q. Did you -- when did you work on the</p> <p>4 design of questions for the printer survey,</p> <p>5 which began in late January '08?</p> <p>6 A. Sometime in January. I can't</p> <p>7 recall exact dates.</p> <p>8 Q. And was it also in January that you</p> <p>9 worked on designing the questions that were</p> <p>10 asked this the camera survey?</p> <p>11 A. That's correct.</p> <p>12 Q. Did you work on both of those on</p> <p>13 the same days in January?</p> <p>14 A. It could have been.</p> <p>15 Q. Were they -- were the initial</p> <p>16 interviews conducted in the same shopping</p> <p>17 malls?</p> <p>18 A. Yes, they were.</p> <p>19 Q. Were the initial shopping --</p> <p>20 interviews conducted by the same interviewing</p> <p>21 -- interviewers in the same shopping malls?</p> <p>22 A. Some may have been and some may</p> <p>23 have been different interviewers, depending</p> <p>24 on the mall situation.</p> <p>25 Q. Did the interviewers, when they</p>	<p style="text-align: right;">Page 21</p> <p>1 McCullough</p> <p>2 A. Yes.</p> <p>3 Q. And those came to your firm</p> <p>4 initially?</p> <p>5 A. The original ones did, yes.</p> <p>6 Q. And then you then provided those to</p> <p>7 counsel.</p> <p>8 A. Correct.</p> <p>9 Q. Did you similarly receive</p> <p>10 questionnaire responses pertaining to</p> <p>11 responses about the cameras?</p> <p>12 A. From the field people that were</p> <p>13 getting -- yes, I did.</p> <p>14 Q. So does your firm have those in</p> <p>15 your possession?</p> <p>16 A. Yes, we do.</p> <p>17 Q. And have you provided those to</p> <p>18 counsel?</p> <p>19 A. They did not ask for them.</p> <p>20 Q. So you still have them?</p> <p>21 A. I still have them in my office.</p> <p>22 Q. How many discussions did you have</p> <p>23 with counsel about the preliminary results of</p> <p>24 the camera questions?</p> <p>25 A. I think probably one.</p>

6 (Pages 18 to 21)

Walter McCullough

<p style="text-align: right;">Page 106</p> <p>1 McCullough</p> <p>2 hundred dollars, and that would be the whole</p> <p>3 price.</p> <p>4 A. Correct.</p> <p>5 Q. And let's look, if we -- just</p> <p>6 looking at the fact sheet on the 5610, you'll</p> <p>7 agree with me, won't you, that the printer</p> <p>8 has a number of features? It has --</p> <p>9 Can we take a look at that?</p> <p>10 A. Sure.</p> <p>11 That's number C? Okay.</p> <p>12 Q. The first bullet says that it</p> <p>13 "prints in copies up to 20 pages per minute</p> <p>14 in black and up to 13 per minute in color."</p> <p>15 A. Okay.</p> <p>16 Q. So that's one feature of the</p> <p>17 printer that might be of interest to some</p> <p>18 people, yes?</p> <p>19 A. Well, I think by definition, every</p> <p>20 printer has a speed, so I'm not sure if</p> <p>21 that's an extra feature. That looks like</p> <p>22 it's just a mechanical description of the</p> <p>23 printer printing.</p> <p>24 Q. The next one says that it copy --</p> <p>25 "automatically copies and scans faxes."</p>	<p style="text-align: right;">Page 108</p> <p>1 McCullough</p> <p>2 is to them, but even, you know, assuming that</p> <p>3 you could do that, and it would be a</p> <p>4 reasonable task, which I'm not sure it would</p> <p>5 be, it's possible that the people could</p> <p>6 decide values to that, and I don't know what</p> <p>7 the value would be, though.</p> <p>8 Q. Given all the features that this</p> <p>9 printer has as outlined on the fact sheet,</p> <p>10 isn't it unreasonable on its face to assert</p> <p>11 that the adaptive lighting feature in</p> <p>12 particular accounts for \$50 of the hundred</p> <p>13 dollars of value of the printer?</p> <p>14 A. It's in the eyes of beholder.</p> <p>15 That's what the consumer actually told me</p> <p>16 they thought it was worth.</p> <p>17 Q. In your judgment, that's not</p> <p>18 unreasonable on its face.</p> <p>19 A. Not unreasonable on its face, no.</p> <p>20 Q. If you --</p> <p>21 MR. BUCHANAN: Strike that.</p> <p>22 Q. From your own experience in using</p> <p>23 devices of this kind, do you find that</p> <p>24 unreasonable, \$50 out of the hundred for that</p> <p>25 one feature?</p>
<p style="text-align: right;">Page 107</p> <p>1 McCullough</p> <p>2 That's a feature that might be of interest to</p> <p>3 some people, yes?</p> <p>4 A. Yes, but it also is implicit in an</p> <p>5 All-In-One. That's what an All-In-One means.</p> <p>6 (Discussion off the record.)</p> <p>7 Q. So to some people it might be</p> <p>8 particularly of interest that this is an</p> <p>9 All-In-One as opposed to a stand-alone</p> <p>10 printer or a stand-alone copier or a</p> <p>11 stand-alone fax machine.</p> <p>12 A. Right.</p> <p>13 And that's in the title of the</p> <p>14 printer.</p> <p>15 Q. Yes.</p> <p>16 So there are a variety of features</p> <p>17 that you could ask about in a survey, yes?</p> <p>18 A. Yes.</p> <p>19 Q. And if you did ask about, let's</p> <p>20 say, ten features, would it be reasonable to</p> <p>21 expect that people would have assigned some</p> <p>22 dollar number to each of the ten?</p> <p>23 A. I'm not sure that the ten might be</p> <p>24 somewhat overwhelming to people in terms of</p> <p>25 trying to come up with their -- the value it</p>	<p style="text-align: right;">Page 109</p> <p>1 McCullough</p> <p>2 A. I really don't have -- it's -- it's</p> <p>3 -- I can't approach this anymore as a</p> <p>4 consumer, because I've gotten too involved in</p> <p>5 it, so I really can't answer that.</p> <p>6 Q. Let me ask you to turn back to the</p> <p>7 main section of the report, and let me ask to</p> <p>8 look at page eight.</p> <p>9 A. Okay.</p> <p>10 Q. If I understand this correctly, for</p> <p>11 the people who were asked about the</p> <p>12 Photosmart C6180 printer --</p> <p>13 MR. BUCHANAN: Strike that.</p> <p>14 Q. The -- the left column reports to</p> <p>15 me findings of the people who were asked</p> <p>16 about that printer, yes?</p> <p>17 A. The C6180, correct.</p> <p>18 Q. And that had a price of one penny</p> <p>19 less than \$300.</p> <p>20 A. That's correct.</p> <p>21 Q. And if I look down at the bottom,</p> <p>22 the median dollar amount answer from the</p> <p>23 respondents as you calculated was \$50.</p> <p>24 A. That's correct.</p> <p>25 Q. And then on the right reports the</p>

28 (Pages 106 to 109)